

1 WRIGHT, FINLAY & ZAK, LLP  
2 Darren T. Brenner, Esq.  
3 Nevada Bar No. 8386  
4 Lindsay D. Robbins, Esq.  
5 Nevada Bar No. 13474  
6 7785 W. Sahara Ave., Suite 200  
7 Las Vegas, NV 89117  
8 (702) 637-2345; Fax: (702) 946-1345  
9 [lrobbins@wrightlegal.net](mailto:lrobbins@wrightlegal.net)

10 *Attorneys for Plaintiff, HSBC Bank USA, National Association, as Trustee for the  
11 Certificateholders of ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-  
12 Backed Pass-Through Certificates*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 HSBC BANK USA, NATIONAL  
16 ASSOCIATION, AS TRUSTEE FOR THE  
17 CERTIFICATEHOLDERS OF ACE  
18 SECURITIES CORP. HOME EQUITY LOAN  
19 TRUST, SERIES 2007-WM1, ASSET-  
20 BACKED PASS-THROUGH  
21 CERTIFICATES,

22 Plaintiff,  
23 vs.  
24 FIDELITY NATIONAL TITLE GROUP,  
25 INC.; FIDELITY NATIONAL TITLE  
26 INSURANCE COMPANY; FIDELITY  
27 NATIONAL TITLE AGENCY OF NEVADA,  
28 INC.; DOE INDIVIDUALS I through X; and  
ROE CORPORATIONS XI through XX,  
inclusive,

Defendants.

Case No.: 2:20-cv-01515-JAD-BNW

**STIPULATION AND ORDER TO  
EXTEND TIME PERIOD TO RESPOND  
TO MOTIONS TO DISMISS [ECF Nos.  
11-13]**

**[Second Request]**

ECF No. 23

29 Plaintiff, HSBC Bank USA, National Association, as Trustee for the Certificateholders of  
30 ACE Securities Corp. Home Equity Loan Trust, Series 2007-WM1, Asset-Backed Pass-Through  
31 Certificates (“HSBC Bank”), Defendants Fidelity National Title Insurance Company (“FNTIC”)  
32 and Fidelity National Title Agency of Nevada, Inc. (“Fidelity Agency”), and Specially-  
33

1 Appearings Defendant Fidelity National Title Group, Inc. (“FNTG”) (collectively, the “Parties”),  
2 by and through their counsel of record, hereby stipulate and agree as follows:

- 3 1. On August 14, 2020, HSBC Bank filed its Complaint in Eighth Judicial District  
4 Court, Case No. A-20-819620-C;
- 5 2. On August 17, 2020, FNTIC filed a Petition for Removal to this Court [ECF No. 1];
- 6 3. On September 15, 2020, FNTIC filed a Motion to Dismiss [ECF No. 11];
- 7 4. On September 15, 2020, Fidelity Agency filed a Motion to Dismiss [ECF No. 12];
- 8 5. On September 15, 2020, FNTG filed a Motion to Dismiss [ECF No. 13];
- 9 6. On September 26, 2020, this Court granted the Parties’ Stipulation and Order to  
10 Extend Time Period to Respond to Motions to Dismiss [ECF Nos. 11-13] [First  
11 Request [ECF No 18];
- 12 7. HSBC Bank’s deadline to respond to all pending Motions to Dismiss is currently  
13 October 29, 2020;
- 14 8. HSBC Bank’s counsel is requesting an additional thirty-two (32) day extension until  
15 Monday, November 30, 2020, to file its response to all pending Motions to Dismiss;
- 16 9. This extension is requested to allow counsel for HSBC Bank additional time to  
17 prepare and finalize these responses due to Counsel’s overburdened schedule;
- 18 10. Counsel for FNTIC, Fidelity Agency and FNTG does not oppose the requested  
19 extension;

20       ///

21       ///

22       ///

23       ///

24       ///

25       ///

26       ///

27       ///

28       ///

1           11. This is the first request for an extension which is made in good faith and not for  
 2           purposes of delay.

3           **IT IS SO STIPULATED.**

<p>4           DATED this 26<sup>th</sup> day of October, 2020.</p> <p>5           WRIGHT, FINLAY &amp; ZAK, LLP</p> <p>6           <i>/s/ Lindsay D. Robbins</i>    7           Lindsay D. Robbins, Esq.    8           Nevada Bar No. 13474    9           7785 W. Sahara Ave., Suite 200    10          Las Vegas, NV 89117    11          Attorneys for Plaintiff, HSBC Bank USA,    12          National Association, as Trustee for the    13          Certificateholders of ACE Securities Corp.    14          Home Equity Loan Trust, Series 2007-WM1,    15          Asset-Backed Pass-Through Certificates</p>	<p>4           DATED this 26<sup>th</sup> of October, 2020.</p> <p>5           SINCLAIR BRAUN LLP</p> <p>6           <i>/s/ Kevin S. Sinclair</i>    7           Kevin S. Sinclair, Esq.    8           Nevada Bar No. 12277    9           16501 Ventura Boulevard, Suite 400    10          Encino, California 91436    11          Attorney for Defendants, Fidelity National    12          Title Group, Inc., Fidelity National Title    13          Insurance Company, and Fidelity National    14          Title Agency of Nevada, Inc.</p>
---	--

13

14

15           **ORDER**

16

17           Based on the parties' stipulation [ECF No. 23], IT IS SO ORDERED. The  
 18          parties are cautioned, however, that counsel's workload and competing calendar  
 19          demands will not be deemed good cause for additional extensions of this deadline.

20             
 21          U.S. District Judge Jennifer A. Dorsey  
 22          Dated: October 29, 2020